



Municipal Stormwater W Washington Phase II Comments
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

May 17, 2006

Dear Sir/Ms:

Attached are the City of Vancouver's comments to the draft of the Western Washington NPDES Phase II Municipal Stormwater Permit.

Although this draft of the permit is a substantial improvement over the original draft, there are still some sections with which we have concerns. Because Vancouver has been recently involved in a third party lawsuit related to this NPDES permit, we are probably more aware of the unintended consequences of specific wording in a regulatory document.

We have identified provisions of concern and have worked with our law department to provide wording alternatives to minimize liability and to make the provision more clear and reasonable.

If you have questions about any of the recommended changes please contact Richard Hoiland at (360) 696-8008.

Sincerely,

Brian Carlson
Director of Public Works

cc: Vic Ehrlich – City Engineer
Annette Griffy - Senior Civil Engineer, Surface Water Management
Richard Hoiland – Civil Engineer, Surface Water Management